

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP, LLC
d/b/a MACMILLAN LEARNING, MCGRAW HILL
LLC, and PEARSON EDUCATION, INC.,

Plaintiffs,

v.

DOES 1 – 50 d/b/a Library Genesis, bookwarrior,
cdn1.booksdl.org, jlibgen.tk, libgen.ee, libgen.fun,
libgen.gs, libgen.is, libgen.lc, libgen.li, libgen.pm,
libgen.rocks, libgen.rs, libgen.space, libgen.st, libgen.su,
library.lol, and llhlf.com

Defendants.

Civil Action No. 23-CV-08136-CM

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Civil Rule 1.3 of the Rules of the United States District Court for the Southern District of New York, I, Kevin P. Lindsey, respectfully move this Court for an Order for admission to practice pro hac vice to appear as counsel for Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, McGraw Hill LLC, and Pearson Education, Inc. (collectively, “Plaintiffs”) in the above-captioned action.

As set forth in my declaration, I am a member in good standing of the bars of the District of Columbia and New York and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission by any court. As required by Local Civil Rule 1.3, certificates of good standing for me from the District of Columbia and New York Bars, each issued within the past 30 days, and a proposed order are attached to this motion.

I appreciate the Court's consideration and look forward to the opportunity to appear in this matter.

DATED: September 27, 2023

Respectfully submitted,

/s/ Kevin P. Lindsey

Kevin P. Lindsey (applicant)

Matthew J. Oppenheim

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